

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

FILED

2014 AUG 15 P 2:49

ARNEY K. HEPBURN

Plaintiff

Vs.

BROWN UNIVERSITY

Defendant

C.A. No.:

DISTRICT COURT
DISTRICT OF RHODE ISLAND

CA 14 - 368 S-LDA

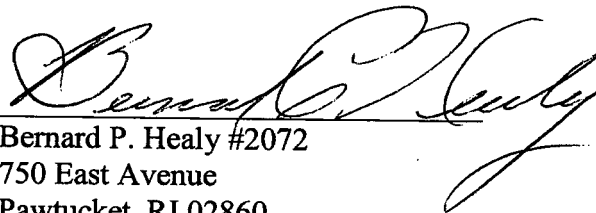
COMPLAINT

1. The Plaintiff, Arney Hepburn, is a resident of the City of Cranston, County of Providence and State of Rhode Island.
2. Brown University is an institution of higher education organized and existing under the laws of the State of Rhode Island.
3. The Plaintiff brings this action pursuant to 42 U.S.C. 2000 and all other relevant law alleging discrimination in employment as a result of race.
4. Arney K. Hepburn had for several years been an employee of Brown University.
5. On or about January 16, 2013, Brown University dismissed Mr. Hepburn from his position as a mail clerk.
6. Said dismissal was allegedly as the result of an incident on January 4, 2013.
7. The Defendant failed to investigate the incident properly, fully, fairly and without bias.
8. The Defendant fired and discharged Arney Hepburn on or about January 16, 2013.
9. The stated reasons for discharge were a pretext, and the motivation for discharge was racial, discriminatory, and without justification.
10. As a direct and proximate result of the discharge of the Plaintiff, the Plaintiff has suffered a grave and severe loss of income, has been

compelled to endure great emotional distress, has suffered a loss of reputation and has otherwise been greatly damaged.

WHEREFORE, the Plaintiff demands judgment against the Defendant for loss of earnings and earning capacity, for compensatory damages secondary to his emotional distress, reasonable attorney's fees, costs and all other relief just and due in the premises.

The Plaintiff,
Arney K. Hepburn
By his Attorney,


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The Plaintiff hereby claims a trial by jury.

